



## Department of Energy

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

00-RU-0514

Mr. P. O. Strawbridge  
Transition Manager  
BNFL, Inc.  
3300 George Washington Way  
Richland, Washington 99352

Dear Mr. Strawbridge:

**REGULATORY UNIT (RU) DISAPPROVAL OF AUTHORIZATION BASIS AMENDMENT REQUEST (ABAR), ABAR-W375-00-00013, REVISION 0, "CHANGES TO THE PROCESS SAFETY MANAGEMENT (PSM) PROGRAM"**

The RU has completed its evaluation of ABAR-W375-00-00013, which was submitted by letter CCN 012921 from A. J. Dobson to D. C. Gibbs, RU, "Contract No. DE-AC06-96RL13308 - W375 – Transmittal of Authorization Basis Amendment Requests," dated April 24, 2000. The RU disapproves the subject ABAR. The disapproval results from an inadequate proposed standard for protection of facility workers from chemical hazards and from proposed reductions in commitments associated with implementing standards for chemical hazard safety criteria.

The proposed revision to Safety Criteria (SC) 2.0-2 relating to the standard for the protection of facility workers from chemical hazards is too limiting, (by restricting the worker protection criterion to accidents involving exposure to certain *concentrations* of airborne contaminants, instead of the whole range of process accidents to which workers may be at risk) and is, therefore, unacceptable. This has the effect of making other, related, proposed revisions to the Safety Requirements Document (SRD), Integrated Safety Management Program (ISMP), and the Quality Assurance Program and Implementation Plan (QAPIP) unacceptable.

The RU also concluded that the proposed substitution of certain sections of the ISMP by Appendix A of the SRD is unacceptable. The proposed Appendix A section constitutes a reduction of SC commitment when compared to the commitment included in the ISMP.

Several of the proposed changes in the ABAR were found acceptable. These include the definition of Safety Design Class (SDC) for Structures, Systems, and Components (SSCs). For chemical hazards, SSCs that are SDC are those SSCs that are required to prevent a single fatality or the hospitalization of 3 or more workers from a process upset (or abnormal event). This definition is acceptable to the RU, and is consistent with 29 CFR 1904.8, "Reporting of Fatality or Multiple Hospitalization Incidents."

Since significant portions of the proposed ABAR are not acceptable, the ABAR is disapproved and no changes are authorized to the associated Authorization Basis documents. The enclosed Safety Evaluation contains additional details related to the RU evaluation of the above changes and related issues.

Nothing in this letter should be construed as changing the Contract (DE-AC27-96RL13308). If you have any questions, please contact me or George Kalman, of my staff, on (509) 372-0652.

Sincerely,

D. Clark Gibbs, Regulatory Official  
Office of Safety Regulation  
of the RPP-WTP Contractor

REG:GK

Enclosure

cc w/encl:  
M. P. DeLozier, CHG  
C. Younger, BNFL